

BEFORE THE
DIVISION OF LICENSING
BOARD OF MEDICAL QUALITY ASSURANCE
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Statement)
of Issues Against:)

RAUL L. ALIAGA)

No. A-391

Respondent.)

DECISION

The attached Stipulation is hereby adopted by the
Division of Licensing of the Board of Medical Quality
Assurance as its Decision in the above-entitled matter.

This Decision shall become effective on October 1, 1984.
IT IS SO ORDERED August 31, 1984.

DIVISION OF LICENSING
BOARD OF MEDICAL QUALITY ASSURANCE

Maire M. McAuliffe
MAIRE MCAULIFFE, M.D.
President

1 JOHN K. VAN DE KAMP, Attorney General
of the State of California
2 JOEL S. PRIMES
Deputy Attorney General
3 1515 K Street, Suite 511
Sacramento, California 95814
4 Telephone: (916) 324-5340

5 Attorneys for Complainant

6
7 BEFORE THE
8 DIVISION OF LICENSING
9 BOARD OF MEDICAL QUALITY ASSURANCE
10 DEPARTMENT OF CONSUMER AFFAIRS
11 STATE OF CALIFORNIA

12 In the Matter of the Statement)
of Issues Against:)

13 RAUL L. ALIAGA)
14 512 North Court Street)
Visalia, California)

15 Respondent.)
16

No. A-391

STIPULATION
AND ORDER

17 Respondent, Raul L. Aliaga, by and through his attorney
18 James Wainwright, and the Board of Medical Quality Assurance,
19 Division of Licensing through its counsel Deputy Attorney
20 General Joel S. Primes, do hereby enter into the following
21 stipulation:

22 1. Respondent, Raul L. Aliaga, hereby acknowledges
23 receipt of Statement of Issues No. A-391, Statement to Respon-
24 dent and copies of the Notice of Defense form.

25 2. Respondent and his counsel have fully discussed
26 the charges and allegations contained in said Statement of Issues
27 No. A-391 on file with the Division of Licensing, Board of

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1 Medical Quality Assurance, and respondent has been fully advised
2 with regard to his rights in this matter.

3 3. Respondent is fully aware of his right to a hearing
4 on the charges and allegations contained in said Statement of
5 Issues No. A-391, his right to reconsideration, appeal and any
6 and all other rights which may be accorded pursuant to the Cali-
7 fornia Administrative Procedure Act and the laws of the State of
8 California.

9 4. Respondent hereby freely and voluntarily waives
10 his right to a hearing, reconsideration, appeal and any and all
11 other rights which may be accorded by the California Adminis-
12 trative Procedure Act and the laws of the State of California
13 with regard to said Statement of Issues No. A-391.

14 5. For the purposes of this proceeding, respondent
15 admits to the truth of each and every factual allegation con-
16 tained in Statement of Issues No. A-391.

17 In mitigation, it is true that respondent is licensed
18 and registered as a doctor in Peru. Respondent has had Cali-
19 fornia experience in OB/GYN and minor surgical procedures.
20 Vernon Bioso, M.D. of the Centro de Salud para Familias, Family
21 Health Center in Orange Cove, California, and Richard Guzzetta,
22 M.D. of the United Health Centers of the San Joaquin Valley,
23 Inc., Orange Cove, California, both represent that respondent
24 had experience performing I.U.D. insertions simply suturing,
25 cast, splint applications, and minor surgical procedures.

26 Based on the foregoing stipulation, the Division
27 of Licensing, Board of Medical Quality Assurance, may issue
28 the following order:

1 Respondent is precluded from taking any examination
2 for licensure as a California physician and surgeon for two
3 years from the effective date of the Board's decision. Respon-
4 dent shall not apply for nor take any examinations to obtain
5 licensure in the State of California as a physician and surgeon
6 until waiting two years from the effective date of the Board's
7 decision.

8 It is agreed that the terms set forth herein shall be
9 null and void and not binding upon the parties hereto unless
10 approved by the Board of Medical Quality Assurance of the State
11 of California.

12 DATED: *MAY 15, 1984*

13 JOHN K. VAN DE KAMP, Attorney General
14 of the State of California
15 JOEL S. PRIMES
16 Deputy Attorney General

17 By *Joel S. Primes*
18 JOEL S. PRIMES
19 Deputy Attorney General
20 Attorneys for Complainant

21 DATED:

22 *James A. Wainwright*
23 JAMES A. WAINWRIGHT
24 Attorney at Law
25 Attorney for Respondent

26 I have read the above document and fully discussed it
27 with my counsel. I agree to the above stipulation and disci-
plinary order.

DATED:

Raul Lopez Aliaga
RAUL LOPEZ ALIAGA
Respondent

1 JOHN K. VAN DE KAMP, Attorney General
of the State of California

2 JOEL S. PRIMES
Deputy Attorney General

3 1515 K Street, Suite 511
Sacramento, California 95814
4 Telephone: (916) 324-5340

5 Attorneys for Complainant
6
7

8 BEFORE THE
DIVISION OF LICENSING
9 BOARD OF MEDICAL QUALITY ASSURANCE
DEPARTMENT OF CONSUMER AFFAIRS
10 STATE OF CALIFORNIA

11 In the Matter of the Statement of) No. A-391
Issues Against:)

12 RAUL L. ALIAGA)
13 512 North Court Street)
Visalia, California)

STATEMENT OF ISSUES

14 Applicant for Physician's and)
15 Surgeon's certificate)

16 Respondent.)
17

18 COMES NOW the complainant, Stephen Wilford, and as
19 cause for disciplinary action against the above named
20 respondent, alleges as follows:

21 I

22 Complainant, Stephen Wilford, is the Acting Executive
23 Director, of the Board of Medical Quality Assurance of the State
24 of California (hereinafter referred to as "Board"), and makes
25 this accusation in such official capacity and not otherwise.

26 II

27 On September 7, 1982, respondent filed with the Board

1 an application for licensure as a physician and surgeon. Respon-
2 dent took the June 1983, Flex Examination. Respondent's appli-
3 cation for licensure as a physician and surgeon is pending.

4 III

5 Business and Professions Code section 480 provides
6 that a board may deny a license regulated by this code on the
7 grounds that the applicant has:

8 "

9 "(2) Done any act involving dishonesty, fraud or
10 deceit with the intent to substantially benefit himself or
11 another, or substantially injure another; or

12 "(3) Done any act which is done by a licensee of
13 the business or profession in question, would be grounds
14 for suspension or revocation of license.

15 "The board may deny a license pursuant to this sub-
16 division only if the crime or act is substantially related
17 to the qualifications, functions or duties of the business
18 or profession for which application is made."

19 IV

20 Business and Professions Code section 2050 provides
21 that:

22 "The Division of Licensing shall issue one form of
23 certificate to all physicians and surgeons licensed by the
24 board which shall be designated as a 'physician's and surgeon's
25 certificate.'"

26 V

27 Business and Professions Code section 2051 provides
28 that:

"The physician's and surgeon's certificate authorizes the holder to use drugs or devices in or upon human beings and to sever or penetrate the tissues of human beings and to use any and all other methods in the treatment of diseases, injuries, deformities, and other physical and mental conditions."

VI

Business and Professions Code section 2052 provides that:

"Any person who practices or attempts to practice, or who advertises or holds himself or herself out as practicing, any system or mode of treating the sick or afflicted in this state, or who diagnoses, treats, operates for, or prescribes for any ailment, blemish, deformity, disease, disfigurement, disorder, injury, or other physical or mental condition of any person, without having at the time of so doing a valid, unrevoked, or unsuspended certificate as provided in this chapter, or without being authorized to perform such act pursuant to a certificate obtained in accordance with some other provision of law, is guilty of a misdemeanor."

VII

Business and Professions Code section 2221 provides that:

"The Division of Licensing may deny a physician's and surgeon's certificate to any applicant guilty of unprofessional conduct and for that purpose shall exercise all the powers granted in this chapter."

VIII

Business and Professions Code section 2274 provides that:

"The use by any licensee of any certificate, of any letter, letters, word, words, term, or terms either as a prefix, affix, or suffix indicating that he or she is entitled to engage in a medical practice for which he or she is not licensed constitutes unprofessional conduct."

IX

Business and Professions Code section 2278 provides that:

"Unless a person authorized under this chapter to use the title 'doctor' or the letters or prefix 'Dr.' holds a physician's and surgeon's certificate, the use of such title, letters, or prefix without further indicating the type of certificate held, constitutes unprofessional conduct."

X

Business and Professions Code section 2289 provides that:

"The impersonation of another licensed practitioner or permitting or allowing another person to use his or her certificate to engage in the practice of medicine or podiatric medicine constitutes unprofessional conduct."

XI

California Administrative Code, title 16, section 1399.520 provides that for purposes of this article a primary

1 care physician's assistant means a person who has met the re-
2 quirements of section 3515, subdivision (c), of the Code, who
3 has passed the examination for primary care physician's assis-
4 tants administered by the National Commission on Certification
5 of Physician's Assistants, and who is certified by the committee
6 to perform direct patient care services under the supervision of
7 a primary care physician or physicians approved by the board to
8 supervise such an assistant.

9 XII

10 California Administrative Code, title 16, section
11 1399.523 provides that a primary care physician's assistant may:

12 (a) Take an appropriate history; perform an appro-
13 priate physical examination and make an assessment therefrom,
14 and record and present pertinent data in a manner meaningful to
15 the primary care physician.

16 (b) Perform and/or assist in the performance of rou-
17 tine laboratory and screening procedures, such as:

18 (1) The drawing of venous blood and routine exami-
19 nation of the blood.

20 (2) Catheterization and routine urinalysis.

21 (3) Nasogastric intubation and gastric lavage.

22 (4) The collection of and the examination of the
23 stool.

24 (5) The taking of cultures.

25 (6) The performance and reading of skin tests.

26 (7) The performance of pulmonary function tests.

27 ///

- 1 (8) The performance of tonometry.
- 2 (9) The performance of audiometry.
- 3 (10) The performance of endoscopic procedures, limited
- 4 to nasoscopy, otoscopy, and anoscopy.
- 5 (11) The performance of pelvic examinations, including
- 6 bimanual examinations and the taking of pap smears.
- 7 (12) The taking of EKG tracings.
- 8 (c) Perform routine therapeutic procedures, such as:
- 9 (1) Injections.
- 10 (2) Immunizations.
- 11 (3) Debridement, suture and care of superficial wounds.
- 12 (4) Debridement of minor superficial burns.
- 13 (5) Removal of foreign bodies from the skin.
- 14 (6) Removal of sutures.
- 15 (7) Removal of impacted cerumen.
- 16 (8) Subcutaneous local anesthesia, excluding any
- 17 nerve blocks.
- 18 (9) Anterior nasal packing for epistaxis.
- 19 (10) Strapping, casting and splinting of sprains.
- 20 (11) Removal of casts.
- 21 (12) Application of traction.
- 22 (13) Application of physical therapy modalities.
- 23 (14) Incision and drainage of superficial skin in-
- 24 fections.
- 25 (15) Start, superimpose and discontinue intravenous
- 26 fluids.
- 27 ///

1 (d) Recognize and evaluate situations which call for
2 immediate attention of the primary care physician and institute,
3 when necessary, treatment procedures essential for the life of
4 the patient.

5 (e) Instruct and counsel patients regarding matters
6 pertaining to their physical and mental health, such as diets,
7 social habits, family planning, normal growth and development,
8 aging, and understanding of and long term management of their
9 disease.

10 (f) Assist the primary care physician in the institu-
11 tional setting (including general acute care hospitals, acute
12 psychiatric hospitals, skilled nursing facilities, intermediate
13 care facilities, and special hospitals as defined in section
14 1250 of the Health and Safety Code) by arranging admissions, by
15 taking complete histories and performing physical examinations,
16 by completing forms and charts pertinent to the patient's med-
17 ical record, by providing services to patients requiring con-
18 tinuing care, including patients at home. This assistance also
19 includes the review of treatment and therapy plans, the ordering
20 of routine diagnostic laboratory tests and procedures and rou-
21 tine diagnostic radiological services, such as bone and chest x-
22 rays, the ordering of therapeutic diets, physical therapy treat-
23 ments, occupational therapy treatments and respiratory care
24 services, and by evaluating patients and performing the pro-
25 cedures and tasks specified in subsections (a), (b) and (c)
26 above and acting as first or second assistant in surgery under
27 the supervision of an approved supervising physician. Nothing

1 in this section shall be construed as authorizing a physician's
2 assistant to prescribe medication, unless he or she is engaged
3 in a health man-power pilot project pursuant to section 3502.1
4 of the Code.

5 (g) Facilitate the primary care physician's referral
6 of patients to the appropriate health facilities, agencies, and
7 resources of the community.

8 In addition to the tasks performable listed herein,
9 primary care physician's assistants may be permitted to perform
10 under supervision of the primary care physician such other tasks
11 except those expressly excluded herein in which adequate train-
12 ing and proficiency can be demonstrated in a manner satisfactory
13 to the board.

14 (h) Transmit orally, or in writing on a patient's
15 record, a prescription from his or her supervising physician to
16 a person who may lawfully furnish such medication.

17 XIII

18 California Administrative Code, title 16, section
19 1399.528 provides that when rendering medical services, a pri-
20 mary care physician's assistant shall at all times wear an identi-
21 fication badge on an outer garment and in plain view, which
22 shall state the assistant's name and the title: PHYSICIAN'S
23 ASSISTANT.

24 XIV

25 Applicant, Raul L. Aliaga, P.A., engaged in the un-
26 licensed practice of medicine and violated Business and Pro-
27 fessions Code sections 480, subdivisions (2) and (3), 2052,

2221, 2274, 2278, 2289 and California Administrative Code, title 16, section 1399.528 as is more specifically set forth below:

Count 1:

Respondent exceeded the scope of authority as a primary care physician's assistant and engaged in the practice of medicine at the San Joaquin Medical Clinic, 512 North Court Street, Visalia, California, on the following patients:

<u>Date</u>	<u>Patient</u>	<u>Medical Procedure</u>
July 1981	Eloisa F.	Insert I.U.D.
July 1981	Irene J.	Removal of I.U.D.
May 1982	Irene J.	Prescription for ampicillin
February 1981	Raul P.	Circumcision
March 1981	Katie H.	Insert I.U.D.
March 1981	Rosie R.	Removal of I.U.D.
March 1981	Tena P.	Removal of I.U.D.
April 1981	Tena P.	Insert new I.U.D.
January 1981	Teresa P.	Insert I.U.D.

Respondent did not wear an identification badge or otherwise identify himself as being a physician's assistant when he treated the above patients. Respondent operated the San Joaquin Medical Clinic during the period December 1980 to December 1981, as if he were Al Caceres, M.D.

Dr. Al Caceres, 1201 Jefferson Street, Suite 2, Delano, California, was respondent's supervising physician from March 1980 through June 1982.

Count 2:

Respondent exceeded the scope of his authorization as

a primary care physician's assistant by preparing and issuing the following prescriptions for controlled substances:

1980

<u>Date</u>	<u>Drug</u>	<u>Patient</u>
12/1/80	APC & Codeine #30	Margie F.
12/12/80	Darvocet-n #30	Henry P.
12/13/80	Serax 15 mg. #60	Sherry C.
12/22/80	Lomotil 2 oz.	Mary F.

1981

1/2/81	APAP & Codeine #3, #30	Rosie R.
1/3/81	APC & Codeine #2, #30	Billy F.
1/3/81	Serax 15 mg. #30	Sherry C.
1/13/81	Promethazine & Codeine 8 oz.	Pedro V.
1/15/81	Promethazine & Codeine 8 oz.	Jesus A.
1/16/81	APC & Codeine #2, #30	Billy F.
1/17/81	Ativan 1 mg. #30	Loretta A.
1/19/81	Phenergan & Codeine 6 oz.	Sara M.
1/21/81	Phenergan & Codeine 8 oz.	Juanita B.
1/21/81	Promethazine & Codeine 8 oz.	Rosie R.
1/21/81	Pediacot Elixir 6 oz.	Henry S.
1/24/81	APC & Codeine #3, #12	Jose V.
1/26/81	Phenergan & Codeine 8 oz.	Santiago T.
2/3/81	Ativan 1 mg. #30	Santiago V.
2/7/81	Promethazine & Codeine 8 oz.	Michelle P.
2/9/81	APC & Codeine #3, 20	Billy F.
2/10/81	Promethazine & Codeine 8 oz.	Jesus A.
2/18/81	Phenobarbital 30 mg. #30	Jesus R.

1	2/18/81	Tussionex 8 oz. Benadryl 25 mg. #20	Eleanor C.
2			
3	2/20/81	Tussionex 6 oz.	Pamela G.
4	2/26/81	Novsmistine 8 oz.	Eleanor C.
5	2/27/81	Tussionex 4 oz.	David P.
6	2/28/81	APC & Codeine #2, #18	Raul P.
7	3/2/81	Serax 15 mg. #60	Sherry C.
8	3/5/81	Phenergan & Codeine 8 oz.	Eleanor C.
9	3/6/81	APC #3, #30	Don H.
10	3/20/81	APC #3, #30	Charlette H.
11	3/24/81	Ativan 1 mg. #30	Cindy L.
12	3/24/81	Fastin 30 mg. #30	Cindy L.
13	3/26/81	APC #3, #30	Loretta A.
14	4/1/81	Limbitrol (5-12-5) #30	Loreto R.
15	4/6/81	Fiorinal #30	Socorro N.
16	4/7/81	Serax 15 mg. #30	Cindy L.
17	4/8/81	Fastin 30 mg. #30	Mary S.
18	4/10/81	Serax 15 mg. #60	Sherry C.
19	4/13/81	Phenergan & Codeine 8 oz.	Rose B.
20	4/14/81	Promethazine & Codeine 8 oz.	Lydia O.
21	4/20/81	" " "	" "
22	4/20/81	Lomotil Elixir 6 oz.	Jacqueline M.
23	4/22/81	Lomotil Elixir 6 oz.	Encamilla V.
24	4/28/81	Novamistine Exp 8 oz.	Lusia G.
25	4/29/81	Promethazine & Codeine 8 oz.	Esperanza H.
26	4/29/81	APC #3, #30	Billy F.
27	4/29/81	Limbitrol 5-12-5 #30	Esperanza H.

1	5/1/81	APC #3, #30	Charlette H.
2	5/2/81	Hycomine 8 oz.	Joe M.
3	5/8/81	Atiuan 1 mg. #20	Melva E.
4	5/15/81	Trilafon 4 mg. #30	Billy F.
5	5/15/81	APC #3, #30	Billy F.
6	5/26/81	APC #2, #12	Consuelo G.
7	5/28/81	Atiuan 1 mg. #30	Felipe R.
8	6/5/81	Atiuan 1 mg. #30	Amy M.
9	6/5/81	Phenobarbital 1/4 #30	Socorro H.
10	6/7/81	APC #2, #20	Jose V.
11	6/10/81	ASA Emprin #100	Jesus A.
12	6/15/81	Lomitil Elix 6 oz.	Juanita A.
13	6/15/81	APC #2, #18	Rosie R.
14	6/15/81	Fastin 30 mg. #30	Velma V.
15	6/19/81	APC #3, #30	Billy F.
16	6/27/81	Phenergan & Codeine 8 oz.	Leonel A.
17	6/29/81	Serax 10 mg. #30	Felipe R.
18	7/2/81	Lomotil	Linda H.
19	7/2/81	APC #2, 18	Elizabeth B.
20	7/3/81	Donnatol Elix 4 oz.	Francesca DeA.
21	7/3/81	Lomotil liquid 6 oz.	Francesca DeA.
22	7/3/81	Vag Cream	Delphina G.
23	7/3/81	Gantrisin 500 #60	Emma R.
24	7/3/81	Premanin #100	Emma R.
25	7/3/81	Benadryl 25 mg. #30	Emma R.
26	7/3/81	Serax 10 mg.	Paula G.
27	7/8/81	Limbitrol 5-12-5 #30	Amy M.

1	7/16/81	Fasting 30 mg. #30	Defina G.
2	7/21/81	Phenergan Exp & Cod. 8 oz.	Juana Q.
3	7/23/81	Phenergan Exp & Cod. 8 oz.	Maria T.
4	7/23/81	APC #2, 18	Connie A.
5	7/24/81	APC #2, 12	Diane S.
6	7/24/81	APC #2, 18	Juana H.
7	7/31/81	Fastin 30 mg. #30	Cindy L.
8	8/1/81	Lomotil 402	Jose G. Jr.
9	8/13/81	Nouhistine DH 4 oz.	Maria T.
10	8/13/81	APC #2, #20	Rosalinda D.
11	8/18/81	Fiorinal #20	Rafael G.
12	8/21/81	Phenergan & Codeine 8 oz.	Candilario L.
13	8/24/81	Darvon #30	Rosalinda D.
14	9/4/81	APC #2, #12	Salvador A.
15	9/8/81	Promethazine & Codeine 8 oz.	Rosie R.
16	9/9/81	Limbitrol 5-12-5 #45	Angela E.
17	9/10/81	Nouahistine DH 8 oz.	Isabel M.
18	9/21/81	Darvon - 65 #18	Christine W.
19	9/25/81	APC #2, #20	Billy F.
20	9/25/81	Darvon - 65 #18	Candelario L.
21	9/29/81	APC & Codeine #2, #20	Susan T.
22	10/5/81	Valium 10 mg. #18	Christine W.
23	10/5/81	Ionamine 15 mg. #30	Irene H.
24	10/8/81	Promethazine & Codeine 8 oz.	Lazara E.
25	10/8/81	Ionamin 15 mg. #30	Candalaria A.
26	10/15/81	Valium 10 mg. #18	Isabel P.
27	10/15/81	Phenergan & Codeine 6 oz.	Rudy E.

1	10/16/81	Phenergan & Codeine 8 oz.	Don G.
2	10/19/81	APC #2, #12	Susan T.
3	10/22/81	Talwin 50 mg. #12	Daniel S.
4	10/22/81	APAP #2, #18	Isabel M.
5	10/26/81	Ionamine 15 mg. #30	Mike G.
6	11/1/81	Choledyl 200 mg. #60	Rosie R.
7	11/1/81	Promethazine & Codeine 8 oz.	Rosie R.
8	11/2/81	Tussionex 802	Esperanza M.
9	11/6/81	Phenergan & Codeine 8 oz.	Alma E.
10	11/6/81	Promethazine & Codeine 8 oz.	Reynaldo M.
11	11/6/81	Limbitrol 5-12-5 #60	Filipe R.
12	11/6/81	APC #2, #20	Maria G.
13	11/12/81	APC #2, #8	Maria T.
14	11/12/81	Phenergan & Codeine 6 oz.	Jacqueline M.
15	11/12/81	Nouahistine DH 8 oz.	Pablo L.
16	11/12/81	Nouahistine DH 8 oz.	Calistro A.
17	11/12/81	Tussionex 8 oz.	Flora M.
18	11/14/81	Phenergan & Codeine 6 oz.	Guadalupe G.
19	11/27/81	Phenergan & Codeine 8 oz.	Bill L.
20	11/28/81	APC #2, #8	Juan V.
21	12/1/81	Phenobarbital 1/4 gr. #30	David T.
22	12/1/81	Dalmine 15 mg. #30	Maria L.
23	12/16/81	Fiorinal #30	Maria M.
24	12/19/81	Nouahistine DH 8 oz.	Martha G.
25	12/20/81	Phenergan & Codeine 8 oz.	Meches E.
26	12/21/81	Ionamine 15 mg. #30	Juanita G.
27	12/22/81	Fastin 30 mg. #30	Mike G.

1	12/23/81	Phenergan & Codeine 8 oz.	Jean S.
2	12/23/81	" " "	Rodolt T.
3	12/24/81	Phenergan & Codeine 8 oz.	Ana Z.
4	12/28/81	Phenergan & Codeine 8 oz.	Manuel B.
5		<u>1982</u>	
6	1/2/82	APC #2, #18	Irene H.
7	1/4/82	Atiuan 1 mg. #30	Joel R.
8	1/7/82	Promethazine & Codeine 8 oz.	Shirley M.
9	1/7/82	Ionamin 15 mg. #30	Alma P.
10	1/7/82	APC #2, #18	Richard M.
11	1/8/82	Atiuan 1 mg. #20	Raul A.
12	1/9/82	Lomotil 8 oz.	Annie G.
13	1/9/82	APC #2, #18	Dolores M.
14	1/11/82	Fiorinal #21	Rosario T.
15	1/11/82	Limbitrol 5-12-5 #60	Roberto S.
16	1/13/82	Dalmane 15 mg. #30	Cora O.
17	1/14/82	Phenergan & Codeine 6 oz.	Derryl R.
18	1/15/82	Phenergan & Codeine 8 oz.	Esther N.
19	1/15/82	Phenergan & Codeine 6 oz.	Veronica G.
20	1/15/82	Phenergan & Codeine 6 oz.	Alicia E.
21	1/16/82	Fiorinal #20	Feliciano V.
22	1/18/82	Phenergan & Codeine 8 oz.	Antonio A.
23	1/18/82	Nouahistine DH 8 oz.	Vicente G.
24	1/21/82	Ionamin 15 mg. #30	Cindy L.
25	1/21/82	APC #2, #30	Lioreta R.
26	1/21/82	Limbitrol 5-12-5 #90	Felipe R.
27	1/21/82	Phenergan & Codeine 8 oz.	Laurie G.

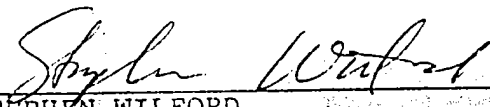
1	1/23/82	Phenergan & Codeine 8 oz.	Arturo E.
2	1/23/82	Fiorinal #20	Leona S.
3	1/25/82	Phenergan & Codeine 8 oz.	Luis C.
4	1/25/82	Nouahistine Exp 8 oz.	Ralph A.
5	1/26/82	APC #2, #30	Maria G.
6	1/26/82	Phenergan & Codeine 6 oz.	Areniras M.
7	1/26/82	APC #2, #18	Mona M.
8	1/27/82	APC #2, #20	Tina A.
9	1/29/82	Phenergan & Codeine 8 oz.	Sixto A.
10	2/2/82	Promethazine & Codeine 8 oz.	Pilar G.
11	2/2/82	Nouahistine DH 8 oz.	Delma B.
12	2/3/82	Phenergan & Codeine 8 oz.	Maria H.
13	2/3/82	Promethazine & Codeine 8 oz.	Cindy L.
14	2/4/82	Ativan #30	Joel R.
15	2/5/82	Promethazine & Codeine 8 oz.	Frank L.
16	2/5/82	APC #2, #18	Frank L.
17	2/5/82	Dalmaine 15 mg. #30	Rebecca G.
18	2/6/82	Phenergan & Codeine 8 oz.	Fabiola D.
19	2/9/82	Promethazine & Codeine 8 oz.	Thomas A.
20	2/10/82	Promethazine & Codeine 8 oz.	Esther S.
21	2/11/82	Promethazine & Codeine 8 oz.	Annabel G.
22	2/12/82	Phenergan & Codeine 8 oz.	Mary A.
23	2/16/82	Phenergan & Codeine 6 oz.	Amy R.
24	2/16/82	Phenergan & Codeine 8 oz.	Fabiola D.
25	2/17/82	Ionamin 15 mg. #30	Luis M.
26	2/17/82	Phenergan & Codeine 8 oz.	Juan O.
27	2/17/82	APC #2, #12	Esther S.

1	2/18/82	Limbitrol 5-12-5 #30	Lorene D.
2	2/20/82	Promethazine & Codeine 6 oz.	Jesus A.
3	2/23/82	Promethazine & Codeine 8 oz.	Vivian V.
4	2/24/82	Phenergan & Codeine 8 oz.	Leticia R.
5	2/25/82	APC #2, #8	Maria B.
6	2/26/82	Ionamin #20	Joe T.
7	3/3/82	APC #2, #12	Esther N.
8	3/5/82	Phenergan & Codeine 4 oz.	Juanita O.
9	3/10/82	Phenergan & Codeine 8 oz.	Alejandro D.
10	3/13/82	Phenergan & Codeine 6 oz.	Delia S.
11	3/17/82	Tenuate Dospan 75 mg. #30	Mary Lou G.
12	3/18/82	Promethazine & Codeine 6 oz.	Macareno R.
13	3/19/82	Promethazine & Codeine 8 oz.	Rosie R.
14	3/20/82	Phenergan & Codeine 6 oz.	Juliana A.
15	3/20/82	APC #2, #12	Hezam A.
16	3/22/82	Phenergan & Codeine 6 oz.	Julie T.
17	3/23/82	Phenergan & Codeine 8 oz.	George P.
18	3/23/82	Tussinx 6 oz.	Esperanza B.
19	3/26/82	Phenergan & Codeine 8 oz.	Samuel G.
20	3/26/82	Phenergan & Codeine 6 oz.	Rudolph V.
21	3/29/82	Promethazine & Codeine 6 oz.	Cruz C.
22	3/29/82	Phenergan & Codeine 4 oz.	Lilian S.
23	3/30/82	APC #2, #12	Billy S.
24	3/30/82	Phenergan & Codeine 8 oz.	Eudora M.
25	3/31/82	Novamistine DH 8 oz.	Juanita A.
26	3/31/82	APC #2, #12	Lyle B.
27	3/31/82	Librium 10 mg. #30	Lyle B.

1 4/1/82 Phenergan & Codeine 6 oz. Francisco P.
2 4/1/82 Phenergan & Codeine 6 oz. Sonia C.
3 5/24/82 Tussionex 6 oz. Aurova H.

4 WHEREFORE, complainant prays that the Division of
5 Licensing, Board of Medical Quality Assurance of the State of
6 California, hold a hearing, and upon proof of any or all charges
7 as contained herein deny respondent's application for a phy-
8 sician's and surgeon's certificate, and for such further action
9 as the Board deems proper.

10 DATED: September 12, 1983.

11 
12 STEPHEN WILFORD
13 Acting Executive Director
14 Board of Medical Quality Assurance
15 State of California

16 Complainant
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